

1 STIP
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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 FRAZIER S. SPEAKS, JR.,

13 Plaintiff,

14 vs.

15 CITY OF NORTH LAS VEGAS, a municipal
16 corporation,

17 Defendant.

CASE NO.: 2:23-cv-00887-APG-MDC

**STIPULATION TO EXTEND DEADLINES
TO RESPOND TO CITY OF NORTH LAS
VEGAS'S MOTION TO DISMISS OR,
ALTERNATIVELY, MOTION FOR
SUMMARY JUDGMENT [ECF Nos. 21, 22]**

(First Request)

18 Plaintiff, Frazier S. Speaks, Jr. ("Speaks"), by and through his counsel, Melanie Hill Law, and
19 Defendant City of North Las Vegas ("CNLV"), by and through its counsel, Kaempfer Crowell, hereby
20 stipulate to extend the deadlines for Mr. Speaks to respond to the City of North Las Vegas's Motion
21 to Dismiss, or, Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21,
22 22] from the current deadlines of August 28, 2024 and September 4, 2024 respectively to September
23 27, 2024. This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth herein.
24 This is the first request to extend the deadlines to respond to these dispositive motions.

25 In support of this Stipulation and Order, the parties state as follows:

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27 1. The current deadlines to respond to the City of North Las Vegas's Motion to
28 Dismiss, or, Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21,

22] is August 28, 2024 for the Motion to Dismiss and September 4, 2024 for the Motion for Summary Judgment. To deal with the discrepancy with these response deadlines being seven days apart pursuant to Local Rule LR 7-2, and given that the motions were combined into one pleading such that it makes the most sense to respond to them together, the parties have agreed to extend the deadlines thirty days from today's date, August 28, 2024, which is Mr. Speaks' current deadline to respond to the Motion to Dismiss [ECF No. 21].

2. Counsel for Plaintiff reached out to counsel for Defendant requesting the thirty-day extension of the response deadlines and the parties have agreed to align the deadlines and grant Mr. Speaks an extension until September 27, 2024 to respond to both motions.

3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to allow counsel for the Plaintiff the additional time requested to respond to these two dispositive motions and align the deadlines to September 27, 2024.

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1 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the
2 deadlines for Mr. Speaks to respond to the City of North Las Vegas's Motion to Dismiss, or,
3 Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21, 22] from the
4 current deadlines of August 28, 2024 and September 4, 2024 respectively to September 27, 2024.

5 DATED this 28th day of August, 2024.


6 **MELANIE HILL LAW PLLC**

KAEMPFER CROWELL

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8 By: /s/ Melanie A. Hill
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By: /s/ Lyssa S. Anderson
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15 IT IS SO ORDERED:

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19 ANDREW P. GORDON
20 UNITED STATES DISTRICT JUDGE

21 Dated: August 29, 2024